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June 8, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 02-353 – Service Rules for Advanced Wireless Services in the
1.7 GHz and 2.1 GHz Bands

Dear Ms. Dortch:

PCIA – the Wireless Infrastructure Association (“PCIA”) hereby submits this *ex parte* letter in support of a proposal (“Joint Proposal”) submitted by T-Mobile USA, Inc. (“T-Mobile”) and the Rural Telecommunications Group (“RTG”) in the above-referenced docket.¹

PCIA is a national trade association representing the interests of entities that develop, own, manage and operate over 50,000 towers, commercial rooftops and other facilities for the provision of wireless, broadcast and other telecommunications services. PCIA’s advocacy activities involve assisting the Commission, industry, and all levels of government in fulfilling the Congressional directive under the Telecommunications Act to provide wireless services to the nation. In the instant proceeding, PCIA seeks to advance wireless service deployment through an appropriately structured auction and sound policy dedicated to the relocation of incumbent licensees.² PCIA believes service deployment over the nation’s wireless infrastructure would best be promoted by adopting the Joint Proposal.

¹ See *Service Rules for Advanced Wireless Services in the 1.7 GHz and 2.1 GHz Bands*, Report and Order, 18 FCC Rcd 25162 (2003), *recons. pending*. See also, Ex Parte Communication to Marlene H. Dortch, Secretary, Federal Communications Commission, from Thomas J. Sugrue, Vice President – Government Affairs, T-Mobile USA, Inc., and Caressa D. Bennet, General Counsel, Rural Telecommunications Group, Inc., WT Docket No. 02-353 (Mar. 11, 2005).

² PCIA reiterates that the Commission should adopt “a band-clearing cost-sharing clearinghouse for the 2110-2150 MHz band to (1) facilitate the relocation of point-to-point microwave incumbents, resulting in rapid deployment of Advance Wireless Services (“AWS”), (2) ensure systematic and equitable cost-sharing for the relocation of incumbent microwave licensees, and (3) minimize the Commission’s burden of resolving cost-sharing disputes among new AWS licensees.” See *Service Rules for Advanced Wireless Services in the 1.7 GHz and 2.1 GHz Bands, Comments of PCIA, The Wireless Infrastructure Association*, WT Docket No. 02-353 (Feb. 7, 2003) at p. 1. See also *Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz, and 2175-2180 MHz Bands, Service Rules for Advanced Wireless Services in the 1.7 GHz and 2.1 GHz Bands, Comments of PCIA, The Wireless Infrastructure Association*, WT Docket Nos. 02-353, 04-356 (Dec. 8, 2004).

The Joint Proposal asks the Commission to revise the band plan for advanced wireless services (“AWS”) in the 1710-1755 and 2110-2155 MHz bands, by breaking up “Block E” at 1740-1755/2140-2155 MHz into three components: 10 MHz (1740-1745/2140-2145 MHz) would be added to existing “Block D” for a total of 20 MHz that could be licensed in 734 MSA/RSA market areas; another 10 MHz (1745-1750/2145-2150 MHz) would create an additional spectrum block, “New Block E,” that could be awarded in 176 EA market areas; and the final 10 MHz (1750-1755/2150-2155 MHz) would be retained for auction winners in 12 REAG market areas as “Block F.” The Joint Proposal would not change the band plan for Blocks A, B and C.

The Joint Proposal allows for up to six entities to acquire spectrum in a variety of markets, and no less than 20 MHz of spectrum would be available in each. By allowing up to six market entrants, the FCC can further promote competition for advanced wireless services in the wireless marketplace. This would facilitate the Commission’s goals of technological innovation and foster additional investment in communications systems and infrastructure, providing more service choices to users.

PCIA further supports the expansion of “Block D” to 20 MHz of spectrum for the smallest market areas (MSAs/RSAs). This auction methodology would permit largely rural carriers access to affordable, adequate spectrum for voice and advanced data services in market sizes suitable to their existing service footprints.

Moreover, secondary market opportunities would be enhanced by the Joint Proposal. Breaking up a 30 MHz block into three components provides for more attractive secondary market transactions, as auction winners could aggregate additional spectrum in smaller increments to supplement existing holdings. Thus, the Joint Proposal eliminates the potential for unnecessary transaction costs of purchasing unduly large spectrum blocks in the secondary market. Such added costs could delay the availability and deployment of the spectrum.

PCIA, therefore, respectfully urges the Commission to adopt the Joint Proposal. Should you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Michael T.N. Fitch

Michael T.N. Fitch
President and Chief Executive Officer